

Appl. No. 10/817,207
Reply Filed: November 22, 2006
Reply to Office Action of: August 24, 2006

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REMARKS

In response to the Office Action of August 24, 2006, the Applicant submits this Reply. In view of the foregoing amendments and following remarks, reconsideration is requested.

Claims 13-18 remain in this application, of which claims 13 and 17 are independent. No fee is due for claims for this amendment.

In the Office Action, all of the remaining claims were rejected.

In view of the cancellation of claims 1-10, the rejection of these claims under 35 U.S.C. §102 is moot. In view of the cancellation of claims 11-12 and 19-20, the rejection of these claims under 35 U.S.C. §103 is moot. Claims 1-10 and 19-22 were cancelled, without prejudice to the underlying subject matter, to simplify the issues for prosecution. Applicant reserves the right to present claims directed to the cancelled subject matter in a continuation application.

Rejection Under 35 U.S.C. §103 of Claims 13-18

Claims 13-18 remain in this application, of which claims 13 and 17 are independent, were rejected under 35 U.S.C. §103 in view of Japanese patent publication 2004-15181 ("Fujimori") and allegedly applicant admitted prior art ("AAPA"), namely paragraphs [0028], [0050], [0051] and [0052] of the present application. The rejection is respectfully traversed.

According to Fujimori, a module converts between a USB 2.0 bus and an IEEE-1394 bus (see abstract).

Regarding the allegations of admitted prior art, clarification is requested regarding what is considered to be the alleged admissions relied upon in the Office Action. In particular, paragraph [0028] is cited in connection with the rejection of claims 13 and 17. Paragraph [0028] describes *an embodiment of the invention* in which software packages provided by the assignee of this application are implemented to provide the invention. However, without the invention, such video editing software packages would communicate with video devices using the IEEE-1394 protocol through an IEEE-1394 compliant serial bus.

Regarding claim 13, as amended, neither Fujimori nor the admitted prior art teaches or suggests that the video application on a computer generates IEEE-1394 commands, which are then converted in the computer to USB commands, which are then transmitted over a USB connection in the computer to a converter device, which in turn converts the USB command back into a IEEE-1394 command, which in turn is transmitted to the digital video device. Fujimori

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merely provides a USB-IEEE-1394 converter device and is silent about additional IEEE-1394-to-USB conversion being performed in the computer.

Similarly regarding claim 17, as amended, neither Fujimori nor the admitted prior art teaches or suggests that the digital video device generates IEEE-1394 commands, which are then converted in a converter device to USB commands, which are then transmitted over a USB connection to the computer, which in turn converts the USB command back into a IEEE-1394 command, which in turn is provided to the video application on the computer. Fujimori merely provides a USB-IEEE-1394 converter device and is silent about additional IEEE-1394-to-USB conversion being performed in the computer.

Accordingly, independent claims 13 and 17 are allowable over Fujimori and the alleged admitted prior art. The remaining claims are dependent claims that are allowable for at least the same reasons.

In addition, regarding claims 14 and 15, the Office Action relies on paragraphs [0051] and [0052] of this application. While these paragraphs indicate that the Windows Driver Development Kit, the IOCTL_1394_CLASS interface described therein are known, there is nothing in these paragraphs that constitutes an admission that either a 1394-USB tunnel driver (as claimed in claim 14) or a USB client device driver that receives data packets from a IEEE 1394 stack (as claimed in claim 15) is prior art. Accordingly, the rejection of claims 14 and 15 is traversed. These drivers are not merely USB drivers, but drivers in the computer system that receive IEEE-1394 commands and generate USB commands.

Regarding claims 16 and 18, the Office Action relies on paragraph [0050] of this application. Paragraph [0050] makes no mention of a chip that converts USB data to IEEE-1394 data. Clarification is requested. Regardless of the source of such a teaching, claims 16 and 18 relate to the conversion between the IEEE-1394 and the USB commands in the computer system, not an external conversion device as in Fujimori.

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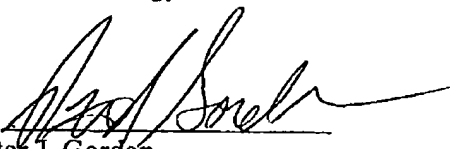
CONCLUSION

In view of the foregoing amendments and remarks, this application should now be in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this reply, that the application is not in condition for allowance, the Examiner is requested to call the Applicants' attorney at the telephone number listed below.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicants hereby request any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, please charge any fee to **Deposit Account No. 50-0876**.

Respectfully submitted,

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